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To: <u>Brooks</u>

Karl

CC: "Carey, Curtis" < Carey. Curtis@epa.gov>

Date: 5/28/2014 10:41:01 AM

Subject: WL Update for approval - to publish today Attachments: 140528-West Lake Update-DRAFT.PDF

Awaiting your approval for lift off...

### Mary P. Peterson, Acting Deputy Director

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### **Preconstruction Work Plan**

On May 16, 2014, EPA Region 7 received from the potentially responsible parties (PRP) a draft "Work Plan for Removal Action Preconstruction Work" at the West Lake Landfill Site. The draft plan is currently under review by EPA Region 7, EPA's Office of Research and Development, and the U.S. Army Corps of Engineers. EPA has the au-

thority to require the PRPs to implement the work plan, and can also require modifications to the work plan based on comments received.

The term "preconstruction" refers to the phase of activities to be

completed prior to construction of the proposed isolation barrier between the municipal solid waste area and the area containing radiologically impacted material (RIM) resulting from leached barium sulfate residues. The preconstruction activities described in the work plan include identification of areas proposed for staging and management of any excavated wastes, clearing of vegetation and surface obstacles, and installation of litter control barriers around areas proposed for excavation and waste staging.

The process for clearing vegetation will follow the previously approved process used for fence construction and Gamma Cone Penetration Testing (GCPT) work conducted in 2013. Prior to any clearing activities in an area containing RIM, the area will be scanned for gamma radiation. If the scan indicates a radiation level above background, the crew will be directed to avoid ground disturbance in that area.

The plans for litter control involve a three-step process. First, temporary litter fencing will be installed along St. Charles Rock Road to provide an outer layer of control to prevent debris from blowing offsite. Second, litter control units will be placed very close to each day's excavation. These units will be moved along with the excavation work as it proceeds. The movable units have side-nets and canopies to stop litter from escaping through the sides or over the top. The third step includes daily manual inspection and removal of litter captured by the fencing and control units.

The draft work plan also includes an air monitoring plan, a health and safety plan, and a radiation safety plan. The air monitoring plan outlines an approach for conducting onsite air monitoring before, during, and after construction of the isolation barrier. The plan calls for the installation of 13 air monitoring stations. Data collected from the monitoring activities will be used to assess and docu-

ment the air quality along the boundaries of OU-1, and to evaluate the potential exposure of occupational workers to airborne contaminants during construction.

EPA will review all data submitted by the PRPs. The data will inform decisions regarding the health and safety of workers and the public, and will document compliance with regulatory standards.

The draft preconstruction work plan and associated plans are available for review at: http://www.epa.gov/region7/cleanup/west\_lake\_landfill/index.htm

### Did You Know...

that St. Louis, like all communities, has background radiation levels contributed by many sources? To learn more about radiation sources in your community:

Learn more about radiation Frequently asked questions

## Don't Miss the next Community Advisory Group Meeting

May 29, 2014 6:30 PM

Operating Engineers Local 513 Offices 3449 Hollenberg Drive Bridgeton, Mo. 63044 Website:

www.westlakecag.org

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